

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA, ex rel
GREGORY LYNN and PAULETTE
HAMILTON,**

CASE NO. 17-14168-RHC

THE HON. ROBERT H. CLELAND

Plaintiffs/Relators,

VS.

CITY OF DETROIT,

Defendant.

LEDERMANLAW, PC
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PLAINTIFFS/RELATORS' WITNESS LIST

PLAINTIFFS/RELATORS GREGORY LYNN AND PAULETTE
HAMILTON [**RELATORS**], on behalf of THE UNITED STATES OF

AMERICA, by their undersigned attorneys, LEDERMANLAW, PC, under the Court's June 2, 2021 Scheduling Order, present the following witness list:

1. Relator Gregory Lynn, c/o Relators' Counsel, Contact Information Above.
2. Relator Paulette Hamilton, c/o Relators' Counsel, Contact Information Above.
3. Records Custodians, Managers, Supervisors, and Employees, City of Detroit and any of its relevant agencies or departments, including but not limited to the Department of Transportation, the Department of Ethics, the Office of Inspector General, Office of Contracting and Procurement, Department of Civil Rights and Inclusion, and Department of Human Resources.
4. Records Custodians, Managers, Supervisors, and Employees, United States Government and any of its relevant agencies or departments, including but not limited to the Federal Transit Administration (see below).
5. Records Custodians, Managers, Supervisors, and Employees, Federal Transit Administration, 200 West Adams Street, UNIT2410, Chicago, Illinois 60606, (312) 353-2789.
6. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Ecolane North America, 940 Valley Road, Suite 1400, Wayne, Pennsylvania 19087, 844-ECO-LANE.
7. Records Custodians, Members, Officers, Managers, Supervisors, and Employees, Enjoi Transportation, LLC, c/o Relator Gregory Lynn.
8. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Transdev Services, Inc., c/o The Corporation Company, 40600 Ann Arbor Road East, Suite 201, Plymouth, Michigan 48170, (630)-571-7070.

9. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Transdev North America, 720 East Butterfield Road, Suite 300, Lombard, Illinois 60148, (800) 225-8880, infoUS@transdev.com.
10. Simone Lowe, General Manager, Transdev North America, 12801 Auburn Street, Detroit, Michigan 48223.
11. Records Custodians, Members, Officers, Managers, Supervisors, and Employees, Intelliride, LLC, 40600 Ann Arbor Road East, Suite 200, Plymouth, Michigan 48170.
12. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, MV Transportation, 4037 Morgan Road, Ypsilanti, Michigan 48197, (734) 552-5043.
13. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Suburban Mobility Authority of Regional Transportation [SMART], Buhl Building, Detroit, Michigan 48226, (866) 962-5515.
14. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Detroit Area Agency on Aging, 1333 Brewery Park Boulevard, Suite 200, Detroit, Michigan 48207, (313) 446-4444.
15. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Checker Cab Company, 6420 East Lafayette Street, Detroit, Michigan 48207, (313) 963-7000.
16. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Comfort and Care Transportation, LLC, 17515 West Nine Mile Road, Suite 875, Southfield, Michigan 48075, (248) 935-2081.
17. Records Custodians, Members, Officers, Managers, Supervisors, and Employees, Wrightway Transportation Service, LLC, 1252 4th Street, Muskegon, Michigan 49441 & 20111 James Couzens Freeway, Detroit, Michigan 48235, (313) 367-2491.
18. Records Custodians, Members, Officers, Managers, Supervisors, and Employees, Moe Transportation, LLC, 23300 Greenfield Road, Oak Park, Michigan 48237, (248) 968-8123.

19. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Datamatics Global Services, Inc., 2900 West Road, Suite 500, East Lansing, Michigan 48823 & 31572 Industrial Road, #400, Livonia, Michigan 48150, (800) 717-9153.
20. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Delray Services, 275 West Grand Boulevard, Detroit, Michigan 48216, telephone number unknown.
21. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Lakeside Divisions, Inc., 13001 Capital Street, Oak Park, Michigan 48237, telephone number unknown.
22. Dan Dirks, Address and Telephone Number Unknown.
23. Martin Moore, General Manager, National Express Transit, LLC, 650 North Saginaw Street, Pontiac, Michigan 48342.
24. Boyse Jackson, Procurement Director, City of Detroit, c/o Defense Counsel.
25. Donald Bryant, Purchasing Manager, City of Detroit, c/o Defense Counsel.
26. Duane Yuille, City of Detroit, c/o Defense Counsel.
27. Lesa Kent, Civil Rights, Inclusion, and Opportunity Department, City of Detroit, c/o Defense Counsel.
28. Charity Dean, Former Director, Civil Rights, Inclusion, and Opportunity Department and Now Director, Black Business Alliance, 1234 Washington Boulevard, Suite 200, Detroit, Michigan 48226.
29. Portia Roberson, Former Director, Civil Rights, Inclusion, and Opportunity Department and Now Chief Executive Officer of Focus Hope, 1400 Oakman Boulevard, Detroit, Michigan 48238, (313) 494-5500.
30. Angelica Jones, Former Interim Director, Detroit Department of Transportation, Now Assistant General Manager of Operations, Broward

County, 1 North University Drive, Suite 31008, Plantation, Florida 33324, (954) 357-8300.

31. Denise Starr, Detroit Department of Human Resources, c/o Defense Counsel.
32. Records Custodians, Members, Officers, Managers, Supervisors, and Employees, Detroit Cab Company/Supreme Care 75, LLC, 3245 Hubbard Street, Detroit, Michigan 48210, (313) 897-6000.
33. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Lyft Hub, 2727 2nd Avenue, Suite 147, Detroit, Michigan 48201, (313) _____.
34. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, People's Transit, Ltd., Romulus, Michigan 48, (734) 467-6000.
35. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Uber Greenlight, 13331 West Ten Mile Road, Oak Park, Michigan 48237, (248) _____.
36. Records Custodians, Directors, Officers, Managers, Supervisors, and Employees, Via Mobility, Address Unknown, (313) 777-8122.
37. All witnesses that any party has identified or described in any case pleadings.
38. All witnesses that Plaintiffs/Relators have identified or described in their proposed First Amended Complaint.
39. All witnesses that any party has identified in their Initial Disclosures.
40. All witnesses that Defendant has identified or described in its Witness List.
41. All witnesses that any party has identified or described or will identify or describe in any discovery requests or responses.

42. All witnesses that any witness identifies or describes in his or her deposition.
43. All witnesses identified or described in any documents related to this case.
44. Rebuttal witnesses as necessary.
45. Under the Federal Rules of Civil Procedure, this District's Local Rules, or any Court Order, Plaintiffs/Relators reserve the right to supplement their Witness List as necessary until the first day of trial.

Dated: October 5, 2021

/s/ Howard Yale Lederman
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BY: Howard Yale Lederman (P36840)
Attorneys for Relators
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Bloomfield Hills, Michigan 48302
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CERTIFICATE OF SERVICE

Gabrielle Frey certifies that on October 5, 2021, she served copies of Relators' Witness List and this Certificate of Service via this Court's electronic filing system on all counsel of record.

/s/ Gabrielle Frey
Gabrielle Frey
Legal Assistant